



**BPA ACTION PLAN FOR ENTERING AND EXITING MINE SITE:
NEW DRAFT**

All BPA employees entering this site shall be currently trained as hazard class III asbestos workers.

At BPA's discretion, BPA employees will use disposable outer clothing in order to reduce the risk of transporting asbestos from dust-generating activities. This shall include Tyvek disposable suits, boot covers or washable boots and disposable gloves. All disposable garments shall be disposed of in accordance with current BPA protocols. This option to wear protective clothing pertains to the access through Rainy Creek Road as well.

Employees who choose to wear respirators on a voluntary basis will follow BPA existing protocols for tight fitting half or full-face piece air-purifying respirators equipped with N or P-100 high efficiency particulate air (HEPA) filters respirators.

BPA Line Maintenance crews will schedule routine maintenance and patrols during wetter months of the year (October thru May) whenever possible to help mitigate airborne dust-generating activities. Emergency situations outside of this timeframe will be handled on a case by case basis.

BPA will employ use of wet methods whenever possible in order to minimize dust levels during line maintenance activities conducted on the right of way. This will include wetting down soil prior to digging around poles or road maintenance activities using a truck mounted pressurized pumper or hand sprayer with a dilute water/detergent solution.

BPA will be allowed and responsible to wash their line equipment on our right of way prior to entering back on Rainy Creek Road to exit the site. This is primarily because the current wash station is above our access to our right of way.

BPA will conduct exposure assessments for additional tasks conducted by BPA on this site. This would include assessments for tasks that disturb soil. The prior three assessments have shown no hazards to personnel for the type of work being performed by BPA employees.

Make available information for BPA staff concerned with potential past asbestos exposure. This would include information on occupational medical screening as well as updates from EPA on the status of exposure evaluations for Libby residents and former mine site employees.

BPA would like the option of installing one of our Substation master locks on the gate at the entrance to Rainy Creek Road. If this is not an option, we would like a key to the lock currently installed at the gate for entry in through Rainy Creek road and access to our Transmission right of way especially in an emergency situation. BPA will continue to notify the responsible organization prior to or shortly after entering on to the mine site.

BPA ACTION PLAN FOR ENTERING AND EXITING MINE SITE: EXISTING

All BPA employees entering this site shall be currently trained as hazard class III asbestos workers.

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BPA will conduct Exposure Assessments for additional tasks conducted by BPA on this site. This would include assessments for tasks that disturb soil.

Make available information for BPA staff concerned with potential past asbestos exposure. This would include information on occupational medical screening as well as updates from EPA on the status of exposure evaluations for Libby residents and former mine site employees.



"Wolfe, Dana R - NF-BELL-1"
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10/24/2007 03:47 PM

To Bonita Lavelle/EPR/R8/USEPA/US@EPA
cc
bcc
Subject BPA action plan for entry into the Libby Mine site

Hi Bonnie,

Sorry I took so long to get back to you. I took a temporary assignment for four months so I have been gone quite a bit. I have attached a modified action plan for entry into the Libby Mine site. Based on our prior conversations, we would like to see some of the restrictions changed for our employees who must enter the mine site to maintain the high voltage transmission line. We have conducted two separate assessments of air quality and soil while our employees have been working in the area. We also conducted air monitoring for a Contractor that needed to clear trees and brush from our right of way. All results have come back non detect. I have all the test reports on file.

The requirement to wear double tyvek and respirator, in our minds creates a larger hazard for our employees. We would also like to see open access through Rainy Creek Road. This entrance is much safer for our employees to access our right of way. We plan on doing continued air and soil monitoring and will modify the requirements of our employees based on the results. At your earliest convenience, please take a look at the modified action plan. I have attached the original so you can compare the changes we made.

Please let me know if our changes are acceptable.

Thank you,
Dana Wolfe
BPA Safety Manager
(509) 990-9547

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Recommendations from our last air monitoring performed April 3rd, 2007

1.0 CONCLUSIONS AND RECOMMENDATIONS

AMEC's conclusions and recommendations are based on Site observations, industrial hygiene field measurements, and analytical results of samples collected on April 3, 2007.

AMEC recommends the following:

1. Two separate environmental/hygiene consulting groups have shown a "negative exposure assessment" in accordance with Federal OSHA asbestos regulations. A reduction in use of respirators and tyvek coveralls should be considered.
2. The personal protective equipment used during the pole change out compromised the workers' overall safety. The workers' communication was hampered by the use of the negative pressure respirators and the double layer of tyvek disposable coveralls inhibited mobility and flexibility, both elements necessary to the workers' ability to perform their duties. BPA and the EPA should consider reducing the use of personal protective equipment to enhance overall safety and worker ability to perform their duties. The negative exposure assessment has been proven on two separate occasions.
3. Perform projects of this type during the time of year when soils are expected to be damp, such as during the early spring, and fall. This should assist in keeping airborne dusts and potential exposures to a minimum while performing Libby, Montana right-of-way work.
4. If maintenance activities of this type are performed during drier times of the year, such as during the summer, additional exposure assessments should be performed.
5. Continue performing general cleaning of the tools and vehicles as part of the overall procedure.
6. Communicate these findings to the affected personnel at BPA.

We appreciate the opportunity to be of service to Bonneville Power Administration on this project. If you have any questions or comments regarding this report, please contact the undersigned at (503) 639-3400.



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